Exhibit A

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ANDREY KOSTIN, a/k/a "Andrei Kostin,"

VADIM WOLFSON, a/k/a "Vadim Belyaev," and

GANNON BOND,

Defendants.

S2 24 Cr. 91 (GHW)

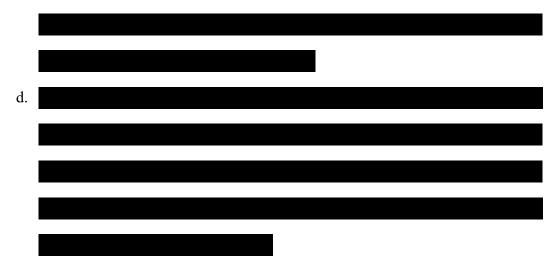
Declaration of David R. Felton

DAVID R. FELTON, pursuant to Title 28, United States Code, Section 1746, declares the following under penalty of perjury:

- 1. I, David R. Felton, submit this declaration under penalty of perjury.
- 2. I am an Assistant United States Attorney at the United States Attorney's Office, Southern District of New York ("USAO-SDNY").
- 4. True and accurate copies of FBI FD-302 reports of prior law enforcement interviews of are attached hereto as Attachments 1, 2, and 3. Specifically: Attachment 1 is a true and accurate copy of an FD-302 report of an interview of from October 25, 2023; Attachment 2 is a true and accurate copy of an FD-302 report of an interview of from June 6, 2024; and Attachment 3 is a

	true and accurate copy of an FD-302 report of an interview of from June 6,	
	2024.	
5. Based on my review of the attached FBI FD-302 reports memorializing two		
	interviews of (i.e., Attachments 1 and 2), and 's counsel's comments to	
	the Government during two phone calls on February 12 and 13, 2025, I expect that	
	would testify to the following if deposed:	
	a.	
	b.	
	c.	

	d.	
6.	Based	on my review of the attached FBI FD-302 reports memorializing a prior
	intervie	ew of (i.e., Attachment 3), and 's counsel's comments to
	the Go	vernment during two phone calls on February 12 and 13, 2025, I expect that
		would testify to the following if deposed:
	a.	
	b.	
	c.	



- 7. On phone calls on February 12 and 13, 2025, counsel to

 first time informed the Government that they are not willing to travel to the United

 States to testify at the trial scheduled for June 16, 2025. In response, the Government

 offered to pay for

 travel and lodging expenses and provide a

 per diem for incidental expenses. Counsel to

 reiterated that,

 notwithstanding the Government's offer to pay for

 travel and

 lodging expenses and provide a per diem, both

 remained

 unwilling to travel to the United States to testify at the trial.
- 8. Both _____, however, are willing to subject themselves voluntarily to a deposition in London, United Kingdom.

Dated: March 7, 2025

New York, New York

David R. Felton

David R. Felton

Assistant United States Attorney United States Attorney's Office Southern District of New York